

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT TENNESSEE
NASHVILLE DIVISION**

In re:) Chapter 11
)
HIAWATHA MANOR ASSOCIATION, INC.,) Case No. 2:25-bk-01916
)
Debtor.) Judge Randall Mashburn

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that the undersigned hereby enters an appearance, pursuant to 11 U.S.C. § 1109(b) and Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, as counsel of record for Hiawatha Manor West Association, LLC (“Hiawatha West”), a creditor and party-in-interest in the above-referenced case.

PLEASE TAKE FURTHER NOTICE that all papers filed pursuant to Fed R. Bankr. R. 2002 and all other notices given or required to be given in this case, should be given and served upon the following:

Michael E. Collins

S. Marc Buchman
MANIER & HEROD, P.C.
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The foregoing request includes not only notices and papers referred to in the above specified Rules and other applicable provisions, but also includes, without limitation, Orders and Notices of all filing with respect to any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written, transmitted or conveyed by email, mail,

delivery, telephone, telegraph, telex, telecopier, otherwise affects or seeks to affect in any way, any rights or interest of the Debtor or any creditor, equity security holder, party in interest, and/or any other person or entity.

PLEASE TAKE FURTHER NOTICE that this *Notice of Appearance and Request for Notice* shall not be deemed or construed to be a waiver of the rights of the undersigned party appearing through counsel: (1) to have final orders in non-core matters and *Stern* claims entered only after *de novo* review by a United States District Court Judge; (2) to trial by jury in any proceeding so triable in these cases, controversies, or proceeding related to these cases; (3) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (4) to have its claims or other rights adjudicated pursuant to any rights of arbitration; or (5) to any other rights, claims, actions, setoffs, or recoupments to which it is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions defenses, setoffs, and recoupments are hereby expressly reserved. All of the above rights are expressly reserved and preserved unto Hiawatha West without exception, and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Respectfully submitted,

/s/ Michael E. Collins

Michael E. Collins (TN BPR No. 16036)

S. Marc Buchman (TN BPR No. 41598)

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*Counsel for Hiawatha Manor West Association,
LLC*

CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2025, a true and correct copy of the foregoing Notice of Appearance and Request for Notice was served on all parties receiving electronic notice via the CM/ECF system.

/s/ Michael E. Collins

Michael E. Collins